

SCURA, WIGFIELD, HEYER,  
STEVENS & CAMMAROTA, LLP  
1599 Hamburg Turnpike  
Wayne, New Jersey 07470  
Telephone: 973-696-8391  
David Stevens, Esq.  
dstevens@scura.com  
*Counsel for Creditor, Amzad Mursalim*

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

*In re:*

**HASHAM R. SYED & NIGHAT A. SYED,**  
  
Debtor

Chapter 13

Case No. 22-17137 (VFP)

Hon. Vincent F. Papalia

Hearing Date: 4/4/2023 at 8:30 a.m.

**AMZAD MURSALIM'S OBJECTION TO CONFIRMATION OF CHAPTER  
13 MODIFIED PLAN AND REQUEST FOR VALUATION HEARING**

Amzad Mursalim ("Mursalim"), by and through his counsel, Scura, Wigfield, Heyer, Stevens & Cammarota, LLP, objects to the confirmation of the Chapter 13 Plan filed by Hasham R. Syed & Nighat A. Syed (collectively, the "Debtors") filed October 5, 2022, on grounds including:

1. Debtors fail to disclose all ownership interests held in corporate entities and inaccurately identifies Prestige America LLC as a sole proprietorship.
2. Objection is made to the value of 54 Saw Mill Road, Kinnelon, New Jersey, as stated on Schedule D of the Petition.
3. Debtors' plan relies on family support payments from an unidentified source. Receipt and continuation of contributions cannot be confirmed or relied upon. The Debtors will not be able to make all payments under the plan or will fail to otherwise comply with the plan.

4. Debtors have failed to demonstrate the feasibility of making the step-up plan payments, which increase from \$450.00 to \$2,575.00 to \$5,500 for the final 54 months of the plan.
5. Debtors fail to disclose all sources of income.
6. Debtors fail to disclose all payments made to creditors by third parties on the Debtors' behalf.
7. Debtors fail to disclose in response to SOFA #7, 8, and 18 an insider mortgage lien granted to Ali Hasmi, Hasham Syed's brother, within 90 days of their bankruptcy.
8. Schedule J of the Petition asserts a Homeownership expense which is not reasonably necessary to be expended.
9. Debtors fail to disclose all ongoing monthly expenses or state inaccurate expenses: e.g., safe deposit box service charge, inaccurate food, healthcare, cell phone, insurance costs.
10. Debtors fail to disclose all income received from all sources derived during the 6 full months before the bankruptcy case was filed.
11. Debtors fail to contribute all disposable income to the funding of the Plan for the applicable commitment period.
12. Debtor has failed to file all applicable Federal and State tax returns as required by 11 U.S.C. §1308.
13. Plan fails to treat the judgment creditor in Part 4 of the plan.
14. The plan may not be confirmed whereas it has not been proposed in good faith.

**WHEREFORE**, Amzad Mursalim, respectfully requests that this Court deny confirmation of the Debtors' plan for the foregoing reasons, requests this Court to schedule a valuation hearing for the determination of the real described as 54 Saw Mill Road, Kinnelon, New Jersey, and any further relief as this Court may deem just and proper.

**SCURA, WIGFIELD, HEYER  
STEVENS & CAMMAROTA, LLP**  
*Attorney for Amzad Mursalim*

Dated: March 28, 2023

/s/ David Stevens  
David Stevens, Esq.